

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

IN THE MATTER OF THE COMPLAINT
REGARDING EARL DAWSON CALDWELL,
IV, a/k/a "Chuck Ashley"

Case No. 9:21-mj-81

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Kenneth D. Hawsey, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is submitted for the limited purpose to establish probable cause that **Earl Dawson Caldwell, IV, a/k/a "Chuck Ashley" ("CALDWELL")**, committed violations of Title 18, United States Code, Section 1591(a)(1) (sex trafficking of children).

2. I am a Special Agent with Homeland Security Investigations (HSI) and have been since 2001. As such, I am an investigative agent or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7), that is, an officer of the United States who is empowered by law to conduct investigations of or to make arrests for offenses enumerated in Title 18, United States Code, Section 2516 (7).

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

JURISDICTION

4. This Court has jurisdiction to issue the requested arrest warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States (including a magistrate judge of such a court) that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

5. On April 30, 2021, the Hardeeville Police Department (“HPD”) began an investigation involving a minor under the age of eighteen (the minor) possibly being the victim of human trafficking in Hardeeville, South Carolina. Information regarding the minor was provided to HPD by the Chatham Division of Family and Children Services in Savannah, GA and Memorial University Children’s Hospital in Savannah, GA. Memorial University Children’s Hospital had treated the minor for a medical condition and while being treated, the minor made statements to the staff that she was being forced to engage in commercial sex, which hospital staff reported to the human trafficking hotline.

6. Specifically, it was reported the minor was possibly being sexually trafficked by two men who were present at the hospital with her, that the minor was addicted to crack cocaine, involved in prostitution, and living out of Room 260 at the Days Inn, located in Hardeeville, South Carolina. Hospital staff identified the two men who were present at the hospital with the minor to be Cederick Riley (“RILEY”) and **CALDWELL**. The minor told hospital staff she was having sex with up to fifteen men a day in exchange for money and drugs.

7. Based on the information provided to HPD regarding the minor, HPD obtained a

search warrant on May 7, 2021, for room 260 at the Days Inn, which was registered to RILEY, to search for the minor, as well as evidence of prostitution and drug distribution. During surveillance prior to execution of the search warrant, officers observed RILEY and a female matching the description of the minor coming in and out of room 260. A short time later, officers observed a young female somewhat matching the description of the minor, leave the Days Inn with an individual known to local law enforcement as Travis HAUPT. However, because officers could not see the face of the young female, they could not confirm the young female was the minor. Unable to confirm the minor had left the Days Inn, officers executed the search warrant on room 260. During the execution of the search warrant, officers located RILEY inside the room with several other people. the minor was not located. A Smith & Wesson pistol, cell phone, scale and various narcotics were located inside the room. RILEY admitted he knew the minor but denied knowing where she was. RILEY was arrested on local charges and booked into the Jasper County Detention Center.

8. After not locating the minor in room 260 at the Days Inn, HSI and SLED located and interviewed HAUPT. HAUPT confirmed the young female he left the Days Inn with was the minor and he had driven her to the Red Roof Inn, located in Yemassee, South Carolina, where she was staying in room 122. Law enforcement responded to room 122 at the Red Roof Inn in Yemassee, located the minor and safely turned her over to the care of the South Carolina Department of Social Services.

9. During further investigation, officers confirmed room 122 at the Red Roof Inn was also registered to RILEY. A review of security video of the back entrance of the Red Roof Inn showed the minor with a black and white male, later identified by the minor as RILEY and CALDWELL, a day or two prior to her being placed in the care of the South Carolina Department

of Social Services on May 7, 2021.¹

10. During the investigation, the cellphones of both the minor and RILEY were seized as evidence and state search warrants were obtained to extract the contents.

11. HSI used the cellphone number XXX-XXX-7761 for the minor provided by the human trafficking tip line to search commercial sex ads on Spotlight.² A search of the number yielded sixty-two (62) commercial sex ads posted between November 7, 2020, and March 1, 2021, in various locations throughout South Carolina and once in Georgia. The ads had various images of a female, which the minor confirmed were her in later forensic interviews, posing in lingerie. One ad on January 8, 2021, stated “I use protection 25/8 rates: Quick visit (20 minutes), 150 half an hour, 200 and hour.” The ad provided the location as Charleston and North Charleston, SC and the samenumber XXX-XXX-7761 identified as the minor’s for perspective clients to call.

12. During forensic interviews of the minor, she explained she was in a romantic relationship with RILEY. the minor further stated RILEY would supply her with drugs and she had to have sex with men. She stated she needed the drugs, so she had to do it. The minor also detailed her involvement with **CALDWELL**. The minor explained **CALDWELL**, whom she referred to as “Chuck Ashley”, was a “Sugar Daddy”.³ The minor met **CALDWELL** shortly after her 17th birthday through Jessica MILLS. MILLS is an adult female who engages in commercial sex and is who introduced the minor to the commercial sex business. **CALDWELL** and MILLS would buy their drugs from RILEY. **CALDWELL** used to be MILL’s “Sugar Daddy”, but they

¹ The minor told officers she had been staying at the Red Roof Inn since May 5, 2021. Employees of the Red Roof Inn advised law enforcement the hotel had lost power a few days prior to May 7, 2021, which had caused the date and time stamp on the security footage to be inaccurate. From viewing the footage, law enforcement believed the date stamp to be off by two days, however, because of the power outage, the exact date and time could not be determined.

² Spotlight is web-based application which captures and stores commercial sex ads for law enforcement to use in sex trafficking investigations.

³ Using the term consistent with its typical definition of a rich older man who provides monetary funds or gifts to a younger woman in return for her company or sexual favors.

had a “falling out”. After **CALDWELL** and MILL’s “falling out”, **CALDWELL** contacted the minor through “Skip the Games”, a commercial sex website. At their first meeting, **CALDWELL** paid the minor \$300 to give her an oil massage. **CALDWELL** told the minor he could get her a hotel room and she would not have to worry about anything. **CALDWELL** would meet with the minor almost daily and she would usually just perform oral sex on him. **CALDWELL** would give the minor cash, provide her drugs, pay off her drug debts and occasionally pay for the minor and RILEY’s hotel rooms. Sometimes, **CALDWELL** would give the minor money, and she would not have to do anything sexual with him. However, eventually **CALDWELL** told the minor he would not give her any more money if they could not have sex. The minor was uncomfortable because **CALDWELL** wanted sex all the time, however the minor felt obligated to have sex with **CALDWELL**, so she did “to get it over with”. **CALDWELL** told the minor he had spent \$38,000 on drugs for her since they met.

13. The minor further revealed in her interviews that **CALDWELL** knew she was only seventeen years old because the minor and MILLS had both told him. **CALDWELL** made videos on his “secret” iPhone 6 of the minor performing oral sex on him at the Days Inn Motel. The minor told law enforcement **CALDWELL** had two different phones, an iPhone 6, which **CALDWELL**’s wife does not know about, and iPhone 11 Pro Max. The minor explained **CALDWELL** liked taking pictures of her naked as well and that she saw photos of herself taken by **CALDWELL** on his iPhone and that she sent some of them to her phone. The minor also suspected **CALDWELL** had access to her social media account, which **CALDWELL** later admitted to her he was on her account controlling it.

14. HSI placed a notification alert in both Custom and Border Protection (CBP) and

ICE's databases to be alerted should **CALDWELL** leave and/or re-enter the United States. HSI received an alert on May 28, 2021, that **CALDWELL** was flying to the Bahamas on May 30, 2021. On June 2, 2021, HSI extracted the contents of **CALDWELL**'s iPhone 11 Pro Max at the Daytona Beach International Airport upon **CALDWELL**'s return from the Bahamas. The iPhone 11 Pro Max was returned to **CALDWELL** and the extraction was sent to HSI Charleston for review.

15. During the course of the investigation, search warrants were also obtained for **CALDWELL**'s Facebook account as well as his two iCloud accounts.

16. The return of one of **CALDWELL**'s iCloud accounts produced two videos taken on December 10, 2020 of the minor performing oral sex on a white male believed to be **CALDWELL** based on his voice.⁴

17. Phone extractions of the minor and **CALDWELL**'s phones revealed many written communications between **CALDWELL** and the minor discussing **CALDWELL**'s participation in commercial sex acts with the minor and acknowledging the minor's age. Below are some examples of these messages, transcribed as accurately as possible:

February 18, 2021

CALDWELL: Yo R u awake

THE MINOR: Can you be here around 7:30-8

CALDWELL: You could give me an oil massage and fuck me:) Or not..lol Leaving here shortly

CALDWELL: Either ty shot her up so she is crashed or he is there and won't let her out of sight.

THE MINOR: Headed to longhorn

February 19, 2021

CALDWELL: Are You planning on taking care of me?

THE MINOR: If you would like that yes

⁴ Through the course of this investigation, I became familiar with **CALDWELL**'s voice after reviewing countless voice messages **CALDWELL** sent to the individuals involved in this case as well as others and therefore, based on that experience, it is my belief the male voice that can be heard in one of the videos is **CALDWELL**.

CALDWELL: I would love that if u are ok with it.

February 24, 2021

CALDWELL: Hey I was out on the boat and just paid room for today Maddie.

THE MINOR: I'm back Come

CALDWELL: I just got back Beaufort. Trying to figure out if I should say something to my business partner about you or not. Whether to sneak out later and come down there, or have you come up here. Miss seeing you.. I want you. Let me know if you still want to get together tonight. I'd still like to get you up here (possibly down there) tonight

THE MINOR: Okay

CALDWELL: How much are you wanting to do tonight.

THE MINOR: What do you mean

CALDWELL: \$ I left 200 with you the other night and 3 hotel nights but you are probably also hoping for some cash too Probably most interested in typical 400or 300 so definitely oil.

I'm on 95 are you going to be there?
where are you

THE MINOR: I'm from Econo Lodge

Pick me up from Econo Lodge
How far are you

CALDWELL: 20 min

What room

THE MINOR: 143

CALDWELL: Come on

Finis up here or where we go

Here in car

I'm leaving

Or come on. You knew when I was coming. And when I'd be here

18. Consistent with the above communication, the investigation revealed **CALDWELL** rented a room at the Best Western for one night on February 24, 2021. A copy of the room rental showed it was registered by Dawson **CALDWELL**. The receipt showed two guests, paid for with an American Express, a phone number and address associated with **CALDWELL**.

March 9, 2021

THE MINOR: Wya

Ignoring me?

CALDWELL: Of course... like like usual.

been sleeping

Hey, been struggling with this a while and was struck with the obvious last night.
I'm not mad, i just came to terms with it today. I've wanted to think i was in

someway helping you or part of a solution but I've accepted that I'm am just another problem contributing to your misery. I ask you to do something you hate to do. My pressure is now off of you, I will never ask you for sex again or to even touch your pussy again. There is a good reason you've refused to allow those two thing with me and it's absolutely your call to make. I also don't need to know why it's ok for others but not me, like you said , I wouldn't understand anyway. And you are right.. I don't. Haha

I don't know exactly where this leaves us but please know I'm not mad and I hope you will read and hear what I'm saying and won't come at me swinging. Lol

THE MINOR: I'm not gonna come at you swinging but that's all it ever was for you. That how we met. you see as a girl who does sexual things in exchange for money. Idc what you say.. I'm right. The fact that you think the situation is funny "haha" is sad. No matter what you say/do, I know in my heart that you only want one thing. You will do ANYTHING to try and get that one thing. You've tried to buy my love. And I've admitted that I have done fucked up shit to you and in my past but I have owned up to my mistakes. I know my wrongs and rights but sometimes chose the wrong because I don't have try as hard as doing right. From this point out.. (if you agree) BUSINESS AND BUSINESS ONLY.

You want an hour ? Hour money

Half hour ? Half hour money.

Business is done here in my room with no problems nor interruptions.

If you want business done at your house .. there will be a travel fee. The travel fee price will go up or down depending on where we are going.

Sorry it has to be this way but this is the only way there will be trust and the correct agreements on the situation and business that will happen. My mind will not change NOR my prices.

Qv 100 (no traveling/ incall only)

Half hour 150 (travel fee - 50\$)

Hour 300 (travel fee - 50\$)

travel fee is only 50\$ to hour house.

CALDWELL: The haha was at myself and las sentence, because in fact you were right, I don't understand. I don't think the whole situation is funny. I've said over and over, I'd give up everything sexual and help financially if you decided you wanted to change lifestyle and do rehab. I do care for you which is why I sent the email. I'm part of the problem and don't feel good about it.

I know said you don't care what I say, however I feel like you've missed the point. It's not that i want to fuck all the time, it's why will you do it others but refuse me. For example, 9 out of 10 times when Nikki and I hang out, all we do is hang out, oil massage each other and head. She's cool if we did fuck every time but it's not my thing. When we do it's usually anal anyway. We do care about each other. She calls me first when her sister is killed. I do care for you and your situation but I don't know if you give a flip about me. We been together 23 times since meeting around thanksgiving. I've given you \$26000. That doesn't include credit card shopping and stuff. That's cash. I've gotten head 5 times. 18 times I'm left high and dry. That's pretty expensive head if you do the math. Does it make sense that it's all about the sexual favors for me? It kinda paints the picture that it's all about

the money to you and you with goal of getting out of delivering your part. The deal Jess proposed just isn't a good deal for you but it puts y'all on equal shitty situations. Misery loves company and she doesn't really want you better off or have it easier than her. Regardless of what she said. Wants you as her partner in crime. The only issue I have with Jess is the way she uses you to make money for her at your expense because you are naive young and hot and she is not. I know you hate doing plays with all these people. I empathize with you. It is however your choice. You are 17, lonely, feel like you know the world, but it has so much more to offer you if you will let it. Don't make the wrong choice simply because it's easier or simply because you can. Nothing makes us more vulnerable than loneliness except greed.

THE MINOR: Your about a lot that. I give up completely. Don't know what to do. I'm done with myself and everything

CALDWELL: "Your about a lot that" what do you mean?

How can I help? I'm here if you want to talk. As a friend and nothing more.

THE MINOR: Oh so no business no more?

CALDWELL: No babe, not what I meant.. I just meant right now if you wanted to talk I was there for you.

THE MINOR: Can you physically be here right now

CALDWELL: I can but don't want to sit in smoke filled room with ninja and dudes.

THE MINOR: Come

CALDWELL: k

THE MINOR: How long

CALDWELL: Hr? Stay casual pls.

THE MINOR: Wya

CALDWELL: I95 20 min

Can u see if ced crack guy has any clear coke I can try?

Ced mentioned he had some really clean stuff

THE MINOR: He'll yeah

Wya

Wya

CALDWELL: Just pulled in

Upfront

THE MINOR: Do you wanna get a room or kick them out

CALDWELL: Ok what are we doing? the qv, hhr, hr thing?

THE MINOR: How long do you want ? hr ?

CALDWELL: Hmm. Not prepared for that. May want to go see Edie first.

Honestly I though you needed to talk.

No more than Hhr of naked time I'd guess . Is that half and half?

Never done it this way so I don't know

How it works

THE MINOR: So an hour total ? Or 30

CALDWELL: Qv probably enough but try first with 30.

No need to get room for 30 min.

THE MINOR: Okay

How what all do you plan on doing

CALDWELL: Can you meet me downstairs for a sec?

THE MINOR: Yes. We can do that thing you want to do (sex) and be down in a min
are you going to Eddie ?

CALDWELL: No and nobody needs to leave room

THE MINOR: Why you say that

Wym

I was paying for my crack

CALDWELL: Come down pls.

THE MINOR: Okay one second I'm getting dressed

CALDWELL: You need a normal place to live where you can shower and dress without people
coming in and out . Geez.

Price for gram and ball of hard from Ced

THE MINOR: Come up and talk to her

CALDWELL: Ok/ Do I know this guy

Can I convert that qv to hr.

THE MINOR: Okay 15 min I1

Okay?

CALDWELL: Imma get a room but not till you are totally ready

And awake

THE MINOR: Get one a sleep inn not here

CALDWELL: Getting one here because I don't need my name

Think it's going to be better tomorrow during day. Is that ok?

Not mad.. just getting too tired.

It will be just after lunchtime if that's ok.

19. On the minor's phone, an image dated February 4, 2021 was located of the minor with no shirt on with her arms covering her breast and a shirtless white male reflected in a mirror in the background of the image. During forensic interviews, the minor identified herself in the image and the white male reflected in the mirror to be **CALDWELL**. She further advised the image was taken at **CALDWELL's** house at "the plantation", which was determined through the course of the investigation to be 1 Stump Hill Place, Sheldon, SC. While there that day, the minor said she performed oral sex on **CALDWELL** and he paid her \$300-\$400.

CONCLUSION

20. Based on the forgoing, I request an arrest warrant be issued for **CALDWELL** for violations of Title 18, United States Code, Sections 1591(a)(1) (sex trafficking of children).

REQUEST FOR SEALING

21. I further request that the Court order this affidavit be sealed until further order of the Court. This document discusses an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal this document because its premature disclosure may give targets an opportunity to flee/continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise seriously jeopardize the investigation.

This affidavit has been reviewed by SAUSA Carra Henderson.

Respectfully submitted,

Kenneth D Hawsey

Kenneth D Hawsey
Special Agent
Homeland Security Investigations

SWORN TO ME VIA TELEPHONE OR
OTHER RELIABLE ELECTRONIC MEANS
AND SIGNED BY ME PURSUANT TO
FED. R. CRIM. P. 4.1 AND 4(d) OR 42(d)(3)
AS APPLICABLE

on October 11, 2021

Mary Gordon Baker

MARY GORDON BAKER
UNITED STATES MAGISTRATE JUDGE